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4800 Monte Way
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September 22, 1999

Mr. Rick Breitenbach
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

Dear Mr. Breitenbach,

I am writing to offer the following brief comments on the Draft Programmatic Environmental Impact Statement/Environmental Impact Report on measures to restore the Bay-Delta estuary.

The program in question is complex and is directed to a number of different, at times conflicting purposes. In considering the various options for meeting these purposes, I urge you to adopt the following general principles:

1. The CALFED plan should seek to maximize water conservation and efficient use. A more aggressive water conservation program, particularly for agricultural uses, would reap large benefits in terms of reduced consumption that could obviate the need for additional storage, either on- or off-stream.

2. The CALFED plan should found its analyses on realistic projections of future water demand. Several parties have expressed concerns that the DWR projections show inflated growth rates in consumptive uses and that these projections fail to account for the impacts of aggressive water conservation measures.

3. The CALFED plan should adopt as fundamental to all alternatives the removal of barrier dams, the increase in instream flows and the acquisition and restoration of fish and wildlife habitat. To allow for the further degradation of fisheries in California is wholly unacceptable, and significant opportunities now exist to improve and restore degraded stream habitat. The recent removal of dams on Butte Creek is a good example of this potential.

4. The CALFED plan appears to rely on increased reservoir levels through raised dams and the construction of new off-stream storage reservoirs to meet increased demands for consumptive uses. Although initially less controversial than constructing new dams on flowing streams, both of these approaches will have major environmental (and in cases such as the proposed enlargement of Friant Dam, unacceptable) impacts in their own right. Other measures to use existing water resources more efficient should receive primary attention. It is counterintuitive to adopt measures to construct new water storage facilities as a means of addressing historical excesses in diverting water from aquatic ecosystems. Vegetation management, erosion control and better forestry practices could improve

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watershed yields and timing of run-off in a more cost-effective and environmentally benign fashion than the construction of new dams, wherever they are situated.

5. In terms of evaluating the impacts and costs of offstream storage, the energy requirements for pumping into these reservoirs should also be acknowledged and weighed. Despite the potential for some recovery of this pumping energy, net energy efficiency even at planned pumped storage facilities in California is no better than 70% at most. The need for additional generation of electricity is an inescapable and perpetual operational expense for utilizing off-stream storage. California and the Western States Coordinating Council Region generally appear to be moving into a period of shortfall in electrical generation capacity, so the demand for electrical energy to operate the state's water systems is no small issue.

6. Finally, the CALFED plan should address the fact that the crisis in water supply and management for the Bay-Delta is not just one of quantity but also of quality. Strict enforcement of pollution limits, including attention to non-point sources of water contamination such as pesticides, heavy metals and sediment, should be a central element of the plan.

In sum, the CALFED plan needs to address the issue of allocation, efficiency, habitat restoration and water quality before it considers new construction. Non-structural approaches to watershed management are likely to yield longer-lasting and more cost effective results than the capital intensive program of off-stream storage envisioned by the plan.

Thank you for your attention to these comments.

Very truly yours,

Jonathan M. Teague